ZANDRA L. LOPEZ
California Bar No. 216567
427 C Street, suite 300
San Diego, Ca. 92101
619.233.3169, ext. 17
fax: 619.684.3522
zll@zandralopezlaw.com

Attorney for **Mr. Ramon Pena-Martinez**

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(**HONORABLE DANA M. SABRAW**)

UNITED STATES OF AMERICA, Plaintiff, v. RAMON PENA-MARTINEZ Defendant.	)	CASE NO. 07cr3211-DMS DATE: January 11, 2008 TIME: 11:00 a.m. NOTICE OF MOTIONS AND MOTIONS: (1) TO COMPEL DISCOVERY; (2) FOR LEAVE TO FILE FURTHER MOTIONS

TO: KAREN P. HEWIT, UNITED STATES ATTORNEY, AND
RANDY JONES, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on January 11, 2008, at 11:00 a.m. or as soon thereafter as counsel may be heard, the defendant, Ramon Pena-Martinez, by and through counsel, Zandra Lopez, will ask this Court to enter an order granting the following motions.

MOTIONS

The defendant, Ramon Pena-Martinez, by and through counsel, Zandra Lopez, pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for an order:

1) to compel discovery; and,
2) for leave to file further motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Respectfully submitted,

//s// *Zandra L. Lopez*

Dated: December 31, 2007

ZANDRA L. LOPEZ
Attorney for Mr. Pena-Martinez